

# Exhibit B

# BAKER BOTTS LLP

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December 18, 2012

BY ELECTRONIC MAIL

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Re: ***In re: Cathode Ray Tubes (CRT) Antitrust Litigation, MDL No 1917***

Dear Mario:

We write in response to your December 3, 2012 letter regarding potential merits deponents of Koninklijke Philips Electronics N.V. (“KPE”) and Philips Electronics North America Corporation (“PENAC”) (collectively “Philips”), which was written on behalf of the Indirect Purchaser Plaintiffs and the Individual Action Plaintiffs (collectively, “Plaintiffs”).<sup>1</sup>

In your letter, you identified thirty-two individuals whom Plaintiffs have expressed interest in deposing - almost three times the number of depositions permitted under the Order Re: Discovery and Case Management Protocol (Dkt. 112) (April 3, 2012). Your letter identifies six individuals the Plaintiffs anticipate noticing first for depositions, and the remaining twenty-six as individuals most likely to be deposed.

The following individuals listed in your letter are no longer employed by Philips:

Milan Baran	David Chang
Rosa Hu	Jerry Lin
Felice Albertazzi	Jim Smith
Ney Corsino	Patrick Canavan
Jeffrey Johnson	Rik Dombrecht
Leo Mink	G.J. Kleisterlee <sup>2</sup>
Jeff Pos	S.K. Lee

<sup>1</sup> Since the December 3rd letter, the State of Florida has stipulated to the dismissal of all of its claims with prejudice.

<sup>2</sup> The Indirect Purchaser Plaintiffs and Philips entered into a stipulation in April 2011 where Mr. Kleisterlee agreed to not object to a deposition notice being effectuated by a party notice under Federal Rule of Civil Procedure 30.

**BAKER BOTTS**<sub>LLP</sub>

Mario N. Alioto

- 2 -

December 18, 2012

Yeong-Ug ("Albert") Yang

Cor Saris

Y.T. Sung

Philips has no records of employment for the following individuals:

Dong Liu<sup>3</sup>

Xiu-Hua Li

Jan Van Knippenberg

Bing Ma

Si-Quan Li

J.K. Park

Limay Liu

Jian-Zhong Sheng

Xheng-Xi ("Frank") Shao

Lawrence Wadsworth

Yu-Zong Song

Ming-Hui Xu

Zheng-Fu ("Sam") Tian

Yi Wang

Since the only individual identified in your letter that remains employed by Philips is from your "most likely to be deposed" group, we are available to meet and confer as to specific deposition requests and timing.

Please let me know if you like to discuss these matters further.

Regards,



Charles Malaise

cc: (via email)  
Nathan Cihlar  
John Bogdanov  
Nicholas Weilheimer

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<sup>3</sup> While there are documents produced in this matter suggesting that a Dong Liu was employed by LG.Philips Displays, Philips does not have any employment records for a Dong Liu that was employed in a position that would be relevant to this litigation.

**BAKER BOTTS**<sub>LLP</sub>

Mario N. Alioto

- 3 -

December 18, 2012

Phil Iovieno  
Defense Counsel